

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Petition of Bell Atlantic for Relief)	CC Docket No. 98-11
From Barriers to Deployment of)	
Advanced Telecommunications Services)	
)	
Petition of U S West for Relief from)	
Barriers to Deployment of Advanced)	CC Docket No. 98-26
Telecommunications Services)	
)	
Petition of Ameritech for Relief from)	
Barriers to Deployment of Advanced)	CC Docket No. 98-32
Telecommunications Services)	

REPLY COMMENTS OF SPRINT CORPORATION

The overwhelming weight of evidence and argument in the initial comments of other parties in the above-captioned dockets supports Sprint's position that the §706 petitions of Ameritech, Bell Atlantic and U S West cannot be granted as a matter of law and should not be granted as a matter of policy:

- The Commission has no statutory power to forbear from §§251(c) and 271 until those provisions have been fully implemented.
- Attempting an end run around the limitations in the Commission's forbearance power, e.g., by creating a single nationwide LATA for high-speed data, is likewise impermissible.
- Current regulation provides ample incentives for these RBOCs and other ILECs to invest in new technology and to reap full, risk-adjusted rewards from those investments.
- As a practical matter, RBOCs retain a bottleneck on xDSL services, which cannot be readily replicated by others using unbundled copper loops and collocation.

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- Competition, not FCC-sanctioned monopolies, is what is needed to bring advanced telecommunications capabilities to market on as widespread a basis as possible.

In these reply comments, Sprint does not wish to encumber the record with duplicative argument and comment. However, Sprint does wish to impress one point on the Commission – the need to deny these petitions expeditiously. The widespread deployment of xDSL services by these RBOCs and other ILECs can be of immense value to the American public by enabling a host of advanced services to be offered to consumers by ILECs, CLECs and enhanced service providers. However, the very pendency of these petitions may disincent ILECs that would otherwise be willing to offer xDSL services under the regulatory status quo from proceeding to do so. With any respect that they may be able to get a better regulatory deal from the Commission – and a concern that offering xDSL services now would belie the need for forbearance – some ILECs may choose to wait until these petitions are acted on before beginning to offer (or expand existing offerings of) xDSL services.

Respectfully submitted,

SPRINT CORPORATION

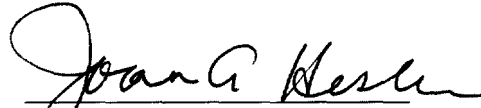


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of Sprint Corporation in CC Docket Nos. 98-26, 98-11 and 98-32 was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 6th day of May, 1998 to the parties on the attached service list:


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